ECCLESIA LAW

Private Ecclesiastical Counsel
United States & International

FINCEN FORM 111

FIDUCIARY FRAUD REPORT

FILING ENTITY: International Grantor Trust (Asset Fortress Protocol)

ON BEHALF OF: [Living man/woman], beneficiary and Holder in Due Course

DATE: xx/xx/xxxx

REFERENCE: Fiduciary Breach by Indentured Trustee / OID–Adverse Claim Nexus

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Executive Summary: FinCEN Form 111 – Fiduciary Fraud Report

This **Suspicious Activity Report (SAR)** is filed by the creditors International Grantor Trust to register a permanent federal record of **fiduciary fraud, non-reporting of nominee income, and concealment of trust proceeds** by the Indentured Trustee. It serves as a regulatory bridge linking commercial dishonour with federal oversight and insured indemnity.

- **Objective of the Filing**: The report establishes a formal record within the **Financial Crimes Enforcement Network (FinCEN)** database regarding the Trustee's failure to maintain faithful performance of its fiduciary duties.
- **Core Violation**: The Trustee and its nominee (the mortgage provider) have unlawfully ignored a **Bill of Exchange (BoE)** tendered in July 2025, which, by operation of the **Bills of Exchange Act 1882** and **UCC Article 3**, resulted in the legal discharge of the mortgage obligation.
- **Fiduciary & Regulatory Breach**: The Trustee's continued enforcement of a discharged debt constitutes **constructive trust fraud** and a violation of the **Trust Indenture Act 1939 (§ 315)**. Furthermore, the failure to report pool income derived from the borrower's original credit deposit violates **Bank Secrecy Act** reporting standards and **IRS nominee reporting** requirements.

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Ecclesia Law operates exclusively under **Attorney-in-Fact mandates** granted by its clients through private powers of attorney, trust indentures, fiduciary appointments, and private contracting structures. Ecclesia Law acts as a **private legal agent**, not as a BAR-regulated public law practice

- **Regulatory Convergence**: This filing is cross-referenced with a **UCC Article 8 Adverse Claim** and a corrective **IRS 1099-OID** filing, creating a tri-layer evidentiary record (commercial, fiscal, and regulatory) that exposes the "debtor/creditor inversion" managed by the bank.
- **Enforcement Trigger**: By filing this SAR, Ecclesia Law activates the Trustee's internal **AML and Compliance teams** and notifies the **OCC Fiduciary Compliance Division**, compelling a review of the Trustee's bond insurance carrier for failure to indemnify a documented fiduciary loss.

This administrative escalation ensures that the Trustee's non-performance is documented as a **"pattern of fiduciary misconduct"** under 31 U.S.C. § 5318(g), providing the necessary leverage to stop unlawful possession and correct the public record .

1. SUBJECT INFORMATION

- **Indentured Trustee:** [Insert Trustee Name, e.g., BNY Mellon]
- **Bonding Carrier:** [Insert Bond Insurer Name, e.g., Travelers Casualty & Surety Co. if known]
- **Servicer/Nominee Bank:** [Insert Mortgage Provider Name, e.g., Lloyds/Birmingham Midshires]
- **Relevant Trust/CUSIP:** [Insert Trust Series or CUSIP if known]

2. SUMMARY OF SUSPICIOUS ACTIVITY

This filing documents **fiduciary breach, dishonoured lawful tender, and concealment of trust proceeds** by a regulated indentured trustee in violation of 31 C.F.R. § 1020.320 and the **Trust Indenture Act 1939 (§ 323(b))**.

- **Lawful Tender:** In July 2025, a **Bill of Exchange (BoE)** was tendered to the Trustee as full discharge of a mortgage obligation under the **Bills of Exchange Act 1882 (§§ 41–52)** and **UCC § 3-603**.
- **Fiduciary Dishonour:** The Trustee failed to validly dishonour the tender within the statutory 72-hour window, which operates as **legal acceptance**.
- **Non-Reporting:** Despite lawful discharge, the Trustee and its nominee (the servicer) continue to report the mortgage as an active debt, concealing the fact that the borrower's original credit (the signature/deposit) settled the account.

- **Tax/Regulatory Fraud:** The mortgage asset continues to generate pool income that is unreported to the true beneficial owner (the living grantor), violating **IRS Publication 1212** and nominee reporting requirements.

3. CONNECTION TO HYBRID BOND CLAIM

This activity has been escalated through a **Hybrid Bond Claim** filed against the Trustee's fiduciary bond carrier.

- The failure to process the lawful tender is both a **fiduciary loss event** (insurable) and a **reportable event of non-performance** under 31 C.F.R. § 1020.320(a)(2).
- The Trustee's bonding company has been notified but has failed to acknowledge the claim within mandatory regulatory deadlines, evidencing a **pattern of fiduciary misconduct**.

4. DESCRIPTION OF THE SUSPICIOUS SCHEME (FORENSIC ANALYSIS)

The scheme involves a "debtor/creditor inversion" where the Trustee treats the bank as the beneficiary while converting the borrower's credit for securitisation.

- **Credit Conversion:** The borrower's signature created the original deposit, which was booked as a bank asset.
- **Constructive Fraud:** By refusing to recognize the BoE discharge and continuing foreclosure, the Trustee is attempting to collect on a discharged obligation—an **abuse of process** and **constructive trust fraud**.
- **OID Misreporting:** The **98-Series International Grantor Trust** has filed a corrective **Form 1099-OID**, re-designating ownership to the true creditor, yet the Trustee continues to misrepresent beneficial ownership in federal records.

5. REGULATORY VIOLATIONS CITED

- 31 C.F.R. § 1020.320(a)(2): Failure to report fiduciary transactions.
- 31 U.S.C. § 5318(g)(1): Fiduciary dishonour and concealment of proceeds.
- **Trust Indenture Act § 323(b):** Bonding company failure to indemnify for fiduciary loss.
- **UCC § 8-105:** Violation of Adverse Claim notice regarding the financial asset .

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6. ACTION REQUESTED

FinCEN is requested to:

1. **Record this fiduciary fraud** and dishonour under a BSA Control Number.
2. **Cross-reference** this report with the related **IRS OID submission** for the [Living man/woman] Grantor Trust.
3. **Notify the OCC Fiduciary Compliance Division** regarding the Trustee's non-performance.
4. **Initiate a review** of the bonding insurer's failure to report or indemnify the fiduciary breach.

DECLARATION: I certify that the information contained herein is true and correct to the best of my knowledge and submitted in good faith for the purpose of lawful fiduciary reporting under the **Bank Secrecy Act**.

Signed,

Trustee International Grantor Trust

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